

EXHIBIT C

Declaration of Philip P. Mann

Case No. 21-CV-0817-TSZ

Bungie v. AimJunkies.com
USDC Western District of Washington-Seattle
Case No. 2:21-cv-811

PARTIES' COMBINED REVISED TRIAL EXHIBIT LIST

Exhibit No.	Party	Description	Admissibility Stipulated	Authenticity Stipulated / Admissibility Disputed	Authenticity Disputed	Date Offered/ Admitted	Objection?
1	Plaintiff	Bungie Destiny 2: Audiovisual Copyright Registration & Deposit Materials re U.S. Copyright Registration Number: PA 2-282-670	X			5/21/2024	Stipulated - ADMITTED
2	Plaintiff	Bungie Destiny 2: Software Code Copyright Registration & Deposit Materials re U.S. Copyright Registration Number: TX 8-933-655	X			5/21/2024	Stipulated - ADMITTED
3	Plaintiff	Bungie Destiny 2: Beyond Light Audiovisual Copyright Registration & Deposit Materials re U.S. Copyright Registration Number: PA 2-280-030	X			5/21/2024	Stipulated - ADMITTED
4	Plaintiff	Bungie Destiny 2: Beyond Light Software Code Copyright Registration & Deposit Materials re U.S. Copyright Registration Number: TX 8-933-655	X			5/21/2024	Stipulated - ADMITTED
5	Plaintiff	Bungie Destiny 2: Beyond Light Copyright Registration & Deposit Materials - video file titled: Beyond_Light_Launch_B_Roll_16x9_1080p30_H264.mp4	X			5/21/2024	Stipulated - ADMITTED
6	Plaintiff	2020-11-02 Video advertising cheat software			X		
7	Plaintiff	2020-11-02 Screenshot TikTok page with video			X		

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8	Plaintiff	Screenshots of cheat			X		
9	Plaintiff	D2 Base (v1.0.5.0) Object Code.zip			X		
10	Plaintiff	D2 BeyondLight (v3.0.0.1) Object Code.zip			X		
11	Plaintiff	Bungie LSLAs from January 2019 – August 24, 2021	X			5/21/2024	Stipulated - ADMITTED
12	Plaintiff	Phoenix Digital Group, LLC Agreement (January 2016)	X			5/21/2024	Stipulated - ADMITTED
13	Plaintiff	J. May PayPal Account Information Sheet		X		5/21/2024	Offered; no obj- ADMITTED
14	Plaintiff	J. May PayPal Account Transaction Sheet		X			
15	Plaintiff	J. May PayPal Account Transaction Sheet		X		5/22/2024	Offered; no obj- ADMITTED
16	Plaintiff	'7696 PayPal Account Information Sheet (AimJunkies.com account)		X		5/22/2024	Offered; no obj- ADMITTED
17	Plaintiff	Excel Spreadsheet filename: Transactions for PayPal Account 1609691869551427696.xlsx (AimJunkies.com account)		X			
18	Plaintiff	3990 PayPal Account Information Sheet		X			

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19	Plaintiff	3990 PayPal Account Transaction Sheet		X			
20	Plaintiff	'1346 PayPal Account Information Sheet (Virtual Advantage Account)		X		5/22/2024	Offered; no obj- ADMITTED
21	Plaintiff	'1346 PayPal Account Transaction Sheet (Virtual Advantage Account)		X			
22	Plaintiff	'0031 PayPal Account Information Sheet (PDG Business account)		X		5/22/2024	Offered; no obj- ADMITTED
23	Plaintiff	'0031 PayPal Account Transaction Sheet (PDG Business Account)		X		5/22/2024	Offered; no obj- ADMITTED
24	Plaintiff	'0031 PayPal Account Transaction Sheet (PDG Business Account)		X			
25	Plaintiff	0761 PayPal Account Information Sheet (Mombot Account)		X			
26	Plaintiff	0761 PayPal Account Transaction Sheet (Mombot Account)		X			
27	Plaintiff	'3104 PayPal Account Information Sheet (Velocity Cheats account)		X		5/22/2024	Offered; no obj- ADMITTED
28	Plaintiff	'3104 PayPal Account Transaction Sheet (Velocity Cheats account)		X			

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29	Plaintiff	Screenshot from AJ website re Destiny 2 - Cheat Information	X			5/21/2024	Stipulated - ADMITTED
30	Plaintiff	Aimjunkies.com Subscription Information page for Destiny 2 VIP Access cheat. Payment page.	X			5/21/2024	Stipulated - ADMITTED
31	Plaintiff	Screenshot from AJ website support forum thread	X			5/21/2024	Stipulated - ADMITTED
32	Plaintiff	Screenshot of Virtual Advantage website	X			5/21/2024	Stipulated - ADMITTED
33	Plaintiff	Screenshot of archive.today historical web page re AJ website	X			5/21/2024	Stipulated - ADMITTED
34	Plaintiff	Screenshot of AJ website		X			
35	Plaintiff	AimJunkies web page captured on December 20, 2022		X			
36	Plaintiff	2019-10-12 User report			X		
37	Plaintiff	Weekly Game Security Reports			X		
38	Plaintiff	November 2019 - January 2020 emails from AimJunkies.com to Schaefer	X			5/21/2024	Stipulated - ADMITTED
39	Plaintiff	J. May login notifications		X			

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40	Plaintiff	PayPal receipt for purchase of cheat	X			5/21/2024	Stipulated - ADMITTED
41	Plaintiff	2020-10-14 Emails			X		
42	Plaintiff	2020-11-04 Letter from M. Humphrey to J. Conway (Schaefer DX 43)	X			5/21/2024	Stipulated - ADMITTED
43	Plaintiff	2020-11-09 MSK Email to J. Green with letter attached	X			5/21/2024	Stipulated - ADMITTED
44	Plaintiff	2020-11-09 Email from MSK to Schaefer with letter attached	X			5/21/2024	Stipulated - ADMITTED
45	Plaintiff	AimJunkies Twitter		X			
46	Plaintiff	Screenshot of 2020-11-11 Tweet by AimJunkies account		X		5/22/2024	Offered; no obj- ADMITTED
47	Plaintiff	2020-11-20 LTR Conway to Humphrey	X			5/21/2024	Stipulated - ADMITTED
48	Plaintiff	2021-06-29 Letter from K. Martin (prior counsel) to H. Simpkins	X			5/21/2024	Stipulated - ADMITTED
49	Plaintiff	2021-08-26 Email sent by D. Schaefer to Bungie's CEO, Pete Parsons	X			5/21/2024	Stipulated - ADMITTED

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50	Plaintiff	2022-01-31 Press Release "Sony Interactive Entertainment to Acquire Leading Independent Videogame Developer, Bungie" https://www.sie.com/en/corporate/release/2022/220201.html (captured on June 9, 2022)		X			
51	Plaintiff	Website Asset Purchase Agreement.	X			5/21/2024	Stipulated - ADMITTED
52	Plaintiff	"Press release" from PDG / Blome	X			5/21/2024	Stipulated - ADMITTED
53	n/a	[removed]					
54	Plaintiff	Banned player spreadsheet			X		
55	Plaintiff	Banned player appeal spreadsheet			X		
56	Plaintiff	James May ban history	X			5/21/2024	Stipulated - ADMITTED
57	Plaintiff	Spreadsheet: 2022 09 15 Bungie - In Game Cheater Reports Oct 2019 through Feb 2021.csv	X			5/21/2024	Stipulated - ADMITTED
58	Plaintiff	Stripe sales records produced by Defendants in first document production. October 2020 through January 2021	X			5/21/2024	Stipulated - ADMITTED
59	Plaintiff	Stripe Spreadsheet	X			5/21/2024	Stipulated - ADMITTED

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60	Plaintiff	2022-01-10 Declaration of David Schaefer in Support of Defendants' Motion to Dismiss and/or Refer to Mandatory Arbitration (Dkt 28-5, 28-6)	X			5/21/2024	Stipulated - ADMITTED
61	Plaintiff	2023-04-10 Declaration of David Schaefer in Opposition to Plaintiff's Motion for Sanctions and to Compel Discovery (Dkt 107-4)	X			5/21/2024	Stipulated - ADMITTED
62	Plaintiff	2023-08-07 Declaration of James May in Opposition to Plaintiff's Motion for Summary Judgment (Dkt 175)	X			5/21/2024	Stipulated - ADMITTED
63	Plaintiff	2022-09-02 Defendant Phoenix Digital Group LLC's Responses to Plaintiff's First Set of Interrogatories Nos. 2, 6, 7	X			5/21/2024	Stipulated - ADMITTED
64	Plaintiff	2023-03-03 Defendant James May's Responses to Plaintiff's Second Set of Interrogatories Nos. 6-8	X			5/21/2024	Stipulated - ADMITTED
65	n/a	[removed]					
66	Plaintiff	Expert CV of Steven Guris	X			5/21/2024	Stipulated - ADMITTED
67	Plaintiff	Screenshot filename: aimjunkies-install-instructions-1.png			X	5/21/2024	Offered-obj overruled ADMITTED
68	Plaintiff	Screenshot filename: aimjunkies-install-instructions-2.png			X	5/21/2024	Offered-obj overruled ADMITTED
69	Plaintiff	Screenshot filename: destiny2-ads-1.png			X		

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70	Plaintiff	Screenshot filename: destiny2-ads-2.png			X		
71	Plaintiff	Screenshot filename: virustotal-aimjunkies-loader-archive.png			X		
72	Plaintiff	Screenshot filename: virustotal-aimjunkies-loader-executable.png			X		
73	Plaintiff	Virustotal screenshot			X		
74	Plaintiff	Expert CV of Drew Voth	X			5/21/2024	Stipulated - ADMITTED
75	Plaintiff	Bungie GST guidelines			X		
76	Plaintiff	Data Ingestion Pipeline			X		
77	Plaintiff	2020-10-14 Email Re: Bungie + CheckPoint/NovaCoast sync			X		
78	Plaintiff	2021-01-06 Email Re: Bungie + CheckPoint/NovaCoast sync (with attachment)			X		
79 (D)	Plaintiff	Original Destiny 2 Code DEMONSTRATIVE	---	---	---	5/21/2024	DEMONSTRATIVE PURPOSES ONLY- NOT ADMITTED
100	Defendants	Expert Report – Brad LaPorte		X			

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101	Defendants	Brad LaPorte Resume	X			5/21/2024	Stipulated - ADMITTED
102	Defendants	Brad LaPorte Publications			X		
103	Defendants	Amended Answer and Counterclaim (DKT#72)		X			
104	Defendants	BUNGIE_WDWA_0000409.XLSX	X			5/21/2024	Stipulated - ADMITTED
105	Defendants	Bungie Privacy Policy (DKT#66-1)	X			5/21/2024	Stipulated - ADMITTED
106	Defendants	Bungie LSLA (Dkt#34-1)	X			5/21/2024	Stipulated - ADMITTED
107	Defendants	BUNGIE_WDWA_0000367	X			5/21/2024	Stipulated - ADMITTED
108	Defendants	BUNGIE_WDWA_0000479		X			
109	Defendants	BUNGIE_WDWA_0000481	X			5/21/2024	Stipulated - ADMITTED
110	Defendants	BUNGIE_WDWA_0000482	X			5/21/2024	Stipulated - ADMITTED
111	Defendants	BUNGIE_WDWA_0000516-7		X			
112	Defendants	BUNGIE_WDWA_0000539	X			5/21/2024	Stipulated - ADMITTED

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113	Defendants	BUNGIE_WDWA_0000540	X			5/21/2024	Stipulated - ADMITTED
114	Defendants	BUNGIE_WDWA_0000541	X			5/21/2024	Stipulated - ADMITTED
115	Defendants	BUNGIE_WDWA_0000368 (AEO)	X			5/21/2024	Stipulated - ADMITTED
116	Defendants	BUNGIE_WDWA_0000410 (AEO)	X			5/21/2024	Stipulated - ADMITTED
117	Defendants	BUNGIE_WDWA_0000412 (AEO)	X			5/21/2024	Stipulated - ADMITTED
118	Defendants	BUNGIE_WDWA_0000416 (AEO)	X			5/21/2024	Stipulated - ADMITTED
119	Defendants	BUNGIE_WDWA_0000417 (AEO)	X			5/21/2024	Stipulated - ADMITTED
120	Defendants	BUNGIE_WDWA_0000419 (AEO)	X			5/21/2024	Stipulated - ADMITTED
121	Defendants	BUNGIE_WDWA_0000420 (AEO)	X			5/21/2024	Stipulated - ADMITTED
122	Defendants	BUNGIE_WDWA_0000421 (AEO)	X			5/21/2024	Stipulated - ADMITTED
123	Defendants	BUNGIE_WDWA_0000463 (AEO)	X			5/21/2024	Stipulated - ADMITTED
124	Defendants	Mann Declaration Exhibit A (DKT#191-1)	X			5/21/2024	Stipulated - ADMITTED
125	Defendants	Mann Declaration Exhibit B (DKT#191-2)	X			5/21/2024	Stipulated - ADMITTED
126	Defendants	Mann Declaration Exhibit C (DKT#191-3)	X			5/21/2024	Stipulated - ADMITTED
127	Defendants	Mann Declaration Exhibit D (DKT#191-4)	X			5/21/2024	Stipulated - ADMITTED

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128	Defendants	Kaiser Declaration (DKT#36)	X			5/21/2024	Stipulated - ADMITTED
129	Defendants	Kaiser Declaration (DKT#66)	X			5/21/2024	Stipulated - ADMITTED
130	Defendants	BUNGIE_JAMS_0001026	X			5/21/2024	Stipulated - ADMITTED
131	Defendants	BUNGIE_JAMS_0001059	X			5/21/2024	Stipulated - ADMITTED
132	Defendants	BUNGIE_JAMS_0001061-2	X			5/21/2024	Stipulated - ADMITTED
133	Defendants	BUNGIE_JAMS_0001153	X			5/21/2024	Stipulated - ADMITTED
134	Defendants	BUNGIE_JAMS_0001383	X			5/21/2024	Stipulated - ADMITTED
135	Defendants	BUNGIE_JAMS_0000720	X			5/21/2024	Stipulated - ADMITTED
136		Expert Report of STEVEN GURIS					